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To Edd Kray, Fred Gerdeman  
cc  
Subject type 1 contamination and mothballing

Take a look at this Edd, this is pretty close I marked some possible modifications inside \*\*\* and will forward this to Fred Gerdeman He is accumulating proposed revisions for the Friday Meeting Do you think we said we would circulate this prior to Friday or just show up with it?

### 3 4 5 Type 1 Building Decommissioning

Decommissioning of buildings classified as type 1 (uncontaminated) based on an approved reconnaissance level characterization report will not require \*\*\*add-additional\*\*\* RFCA

decision documents and will proceed based on standard plant operating procedures

However, if contamination is discovered, during decommissioning of a building classified as Type 1, decommissioning activities *except PCBs - asbestos* that might cause a threat of release \*\*\*add?-in the affected areas\*\*\* will cease until the LRA is notified and the need to reclassify the facility is considered collaboratively

Discovery of minor spots of contamination will not necessarily result in the need to reclassify a building upwards into the Type 2 classification If minor contamination can be removed by methods in which there is *discussed-all methods can result* *a very low probability of a release to the environment* in some dispersion \*\*\* no possibility of dispersion or release to the indoor or outdoor environment, for example by simply cutting out a section of a panel holding a spot of fixed contaminant, the building may remain as Type 1

\*\*\*Contamination will be cleaned up and disposed properly using existing radiological or hazardous waste management procedures until an SOP (RSOP? no SOP in RFCA-may not be a suitable RSOP topic) \*\*\* is approved Then,\*\*\*

Minor contamination in type 1 buildings will be removed by standard methods described in a SOP submitted to the LRA

Reclassification into the type 2 category must be considered in any instance where removal techniques involve a "threat of release" These would include operations which disrupt materials in such a manner as to result in ~~airborne or waterborne concentrations of contaminants~~ a release.

*purpose of this sect*  
"Release" defined as:  
For the mothballing issue  
Add to sec 3 4 4, on RLCR

The RLCR will be submitted to the LRA prior to  
\*\*\* undefined term perhaps replace with "mothballing" -delete? removing any building from service \*\*\*  
or beginning decommissioning Should

DOE/KH choose to "mothball" a facility for a period prior to \*\*\*replace inception with completion\*\*\* of decommissioning, DOE/KH will prepare a hazards

analysis of the facility *define* specific to the mothballed period, meet with the LRA to discuss any potential hazards or releases to the environment which might occur during the mothball period, devise mitigative actions for potential releases in collaboration with the LRA and propose adequate monitoring methods

① Approved by LRA? Did we agree to this?  
② What's definition of SOP vs. procedure?

ADMIN RECCRD 1/A  
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